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Attorneys for Defendant
National Consumer Telecom & Utilities Exchange, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JAMES MOLINARO,

Plaintiff,

v.

NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC.,

Defendant.

Case No. 2:21-cv-01948-JCM-BNW

**STIPULATION FOR EXTENSION
OF TIME FOR NATIONAL
CONSUMER TELECOM &
UTILITIES EXCHANGE, INC. TO
FILE RESPONSE TO COMPLAINT**

(SECOND REQUEST)

Defendant National Consumer Telecom & Utilities Exchange, Inc. (“Defendant” or “NCTUE”), by and through its counsel of record, the law firm Greene Infuso, LLP, and Plaintiff James Molinaro (“Plaintiff” or “Molinaro”), by and through his counsel of record, the law firm of Krieger Law Group, LLC, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed its Complaint on October 22, 2021;

WHEREAS, Defendant NCTUE’S deadline to respond to Plaintiff’s Complaint is December 20, 2021;

WHEREAS, due to the recent retention of counsel and the parties’ efforts to resolve this matter without the need for further litigation, Plaintiff has agreed to give Defendant NCTUE up through and including January 7, 2022 in which to respond to Plaintiff’s Complaint;

1 WHEREAS, there are no other deadlines that are affected by this stipulation that are
2 presently known to the parties; and

3 WHEREAS, this stipulation is not entered into for any improper purpose or to delay;

4 THEREFORE, Plaintiff and NCTUE hereby stipulate and agree that NCTUE may have up
5 through January 7, 2022 in which to respond to Plaintiff's Complaint.

6
7 Respectfully Submitted by:

8 **GREENE INFUSO, LLP**

9
10 /s/ Michael V. Infuso
11 Michael V. Infuso, Esq.
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Approved by:

KRIEGER LAW GROUP, LLC


/s/ Shawn Miller, Esq.
David Krieger, Esq.
Nevada Bar No. 9086
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2850 W. Horizon Ridge Pkwy
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Henderson, Nevada 89052

ORDER

15 IT IS ORDERED that ECF No. 11 is DENIED without
16 prejudice under Local Rule IA 6-1(a), which provides,
17 in part, "A request made after the expiration of the
18 specified period will not be granted unless the
19 movant or attorney demonstrates that the failure to
20 file the motion before the deadline expired was the
21 result of excusable neglect."

22 IT IS SO ORDERED

23 DATED: 11:42 am, December 27, 2021

24 

25 BRENDA WEKSLER
26 UNITED STATES MAGISTRATE JUDGE
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